

REMARKS

Claims 1-19 and 34-43 were pending in the application. Claims 20-33 are withdrawn. Claims 1-19, and 34-43 are rejected.

Claims 1, 15, 17, 19, and 34 are amended herein. Claims 44 and 45 are new.

As discussed below, all of the claims are in condition for allowance. **But if after considering this response, the Examiner does not allow all of the claims, then the Applicant's agent requests that the Examiner contact him to schedule and conduct a telephone interview before issuing a subsequent office action.**

Rejection of Claims 1-13, 15-18, and 34-42 Under 35 U.S.C. § 102(e) Over Cannon (U.S. Pat. No. 6,842,447)

Claim 1.

Claim 1 is amended. Claim 1 recites a gateway including an IP port for coupling to an IP network device, one or more handset ports for coupling to non-IP digital PBX telephone handsets, and a protocol translator circuit that translates non-IP digital PBX telephone call control signals from the handset ports directly into IP telephone call control signals delivered to the IP port and translates IP telephone call control signals from the IP port directly into non-IP digital PBX call control signals delivered to the handset ports.

For example, FIG. 1A shows a remote handset gateway 11 that includes handset ports coupled to traditional (non-IP) digital handsets 10 and an IP port for coupling to an IP call controller 12. A block diagram of an internal structure is also shown in FIG. 2 showing handset ports 31 and an IP port 39. Notably, the block diagram shown in FIG. 2 illustrates an all-digital architecture. That is, IP call control signals are converted directly to non-IP digital PBX call control signals. Similarly, non-IP digital PBX call control signals are converted directly to IP call control signals.

The direct conversion between digital call control signal protocols may reduce problems inherent in digital-to-analog and subsequent analog-to-digital conversions.

In contrast, Cannon does not disclose a remote handset gateway that includes both handset ports and an IP port. Since there is no gateway that connects to both remote handsets and an IP port, Cannon also does not disclose a protocol translator

circuit for translating call control signals directly to and from non-IP digital PBX handsets and IP.

Cannon's handsets 31 are connected to a PBX 33. The PBX 33 is connected to an enterprise gateway 35. Cannon states that the structure and operation of the enterprise gateway 35 is similar to that of the PSTN/IP gateways 29. Cannon's PSTN/IP gateways 29, in-turn, receive PSTN signals through a switch 27 and convert them to IP signals for delivery to the IP network 13. Therefore, Cannon's enterprise gateway 35 must connect to IP signals on the network side and PSTN signals to the PBX.

Therefore, Cannon's PBX communicates with the enterprise gateway 35 via PSTN signals. PSTN signals are analog signals. Therefore, Cannon's system taken as a whole translates an incoming (digital) IP call control signal to an (analog) PSTN signal in one housing, and transmits the analog signal to a second housing where the analog signal is converted to a (digital) non-IP PBX telephone call control signal. Cannon does not directly convert from IP to digital PBX and from digital PBX to IP in an all-digital circuit using an all-digital signal path.

Therefore, Cannon does not disclose or reasonably suggest all the limitations of claim 1, and claim 1 is allowable over Cannon.

Claims 2-13.

Claims 2-13 are allowable by virtue of their dependence from claim 1.

Claim 15.

Claim 15 recites a gateway coupled both to non-IP digital PBX telephone handsets and to an IP network with an all-digital protocol translator circuit configured to translate the respective call control signals, and a remote IP call controller.

For example, FIG 1A shows a gateway 11 coupled to a remote IP call controller 12. FIG. 2 shows an all-digital protocol translator architecture

In contrast, by reasoning described above with respect to claim 1, Cannon does not disclose a gateway that is coupled to both non-IP digital PBX telephone handsets and to an IP network. Cannon also does not disclose an all-digital protocol translator circuit because the respective signals undergo an intermediate translation to PSTN (analog) signals.

Therefore, Cannon fails to disclose or reasonably suggest all the limitations of claim 15, and claim 15 is allowable over Cannon.

Claim 16.

Claim 16 is allowable by virtue of its dependence from claim 15.

Claim 17.

Claim 17 claims a system including a proprietary IP telephone call controller that uses proprietary IP (digital signal) call control protocols, a gateway coupled to the global IP network at a location remote from the call controller and operable to directly translate non-IP digital call control signals received from a handset into IP call control signals according to proprietary IP call control protocols of the call controller and vice versa.

As explained above in conjunction with claim 1, Cannon does not disclose directly translating IP call control signals to digital PBX call control signals nor directly translating digital PBX call control signals to IP call control signals.

Therefore, Cannon fails to disclose or fairly suggest all the limitations of claim 17, and claim 17 is allowable over Cannon.

Claim 18.

Claim 18 is allowable by virtue of its dependence from claim 17.

Claim 34.

Claim 34 is allowable for reasons similar to those given for claim 1. Specifically, Cannon does not disclose or reasonably suggest translating non-IP digital PBX telephone call control signals directly to and directly from IP telephone call control signals.

Claims 35-42.

Claims 35-42 are allowable by virtue of their dependence from claim 34.

Rejection of Claims 14, 19, and 43 Under 35 U.S.C. § 103(a) Over Cannon In

View of Bailis (WO 00/11818)

Claims 14 and 43 are allowable by virtue of their respective dependencies from claims 1 and 34.

Claim 19.

Claim 19 recites a plug in card coupled to a proprietary IP telephone call controller and also coupled to non-IP digital PBX handsets, and a protocol translator

circuit for translating non-IP digital call control signals directly to and from IP call control signals.

For example FIG. 1C shows a handset gateway card 40 so configured.

In contrast Cannon, for reasons described above in conjunction with claim 1, does not disclose a protocol translator circuit for translating non-IP digital call control signals directly to and from IP call control signals. Cannon's protocol translator is broken into two distinct portions that communicate via analog PSTN call control signals.

Bailis also does not disclose a protocol translator circuit for directly translating non-IP digital call control signals to and from IP call control signals.

Therefore, Cannon and Bailis, alone and in combination, fail to disclose or reasonably suggest all the limitations of claim 19, and claim 19 is allowable over Cannon in view of Bailis.

Should any additional fees be required, please charge them to Deposit Account No. 07-1897.

If the Examiner believes that a telephone interview would be helpful, he is respectfully requested to contact the Applicant's agent at (425) 455-5575.

Dated this 18th day of June, 2008.

Respectfully submitted,

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